

EXHIBIT A

August 11, 2023

Plaintiff: Stephan Ricks

Case Number: 22-CV-00773-LY

Subject: Plaintiff, Stephan Ricks request the following defendants

1. OPC
2. DMA Properties

to submit the following discovery documents. Pursuant to federal rule 34 (documents and things).

defendants Diane McIver, Roxanne Meriquil, Travis county social workers and health and human services supervisors, OPC moving employees and all other defendants who may or may not have knowledge of the plaintiffs case, etc.,

Stephan Ricks request the defendants OPC and DMA Properties to submit the following discovery documents.

1. Plaintiff, Stephan Ricks, request that the following

defendants:

1. Diane McIver may or may not have knowledge involving the case;
2. Nicole Guptil may or may not have knowledge involving case;
3. Roxanne Meriquil may or may not have knowledge involving case;
4. Travis county social workers may or may not have knowledge involving case;

5. Travis county health and human services supervisors may or may not have knowledge involving the case,
 6. Travis county Health and Human Services may or may not have knowledge involving the case, 5325 Airport Blvd., Austin, Texas, 78751;
 7. Mondo Reyes may or may not have knowledge involving the case
 8. Augi Rivera may or may not have knowledge involving the case,
 9. Emily Habermehl of Family Eldercare may or may not have knowledge involving the case, 1320 Art Dilly Dr., Austin, Texas 78702
 10. OPC employees may or may not have knowledge involving the case, 1320 Art Dilly Dr., Austin, Texas, 78704
 11. Helen Varty may or may not have knowledge involving the case
 12. Liz Logan may or may not have knowledge involving the case
 13. Hud investigator may or may not have knowledge involving the case
- a. And to compel the aforementioned defendants to turn over all
- 1.electronic documents
 2. emails
 3. voicemails
 4. text messages
 5. Photographs
 6. all work orders
 7. all fire marshal inspections
 8. HUD property inspections including the names of all the HUD inspectors
 9. leases
 10. electronic recordings
 11. appointment schedules
 12. written communications documents

13. Facebook
14. Twitter
15. Tic Tok
16. WhatsApp
17. Signal
18. Instagram
19. Duo, and any other social media platforms
20. any and all past and pending lawsuits from 2011 to 2023 against the defendants OPC and DMA Properties
21. The names and telephone numbers of all custodians of all records
22. The location of where all records are stored
23. lawsuits, specifically against DMA Properties and employees working for DMA Properties
24. The policies and procedures for the retention of all records
25. The names of insurance companies and telephone numbers and contact persons
26. The monetary amount of their insurance policies
27. all other communications relevant to plaintiff, Stephan Ricks' case, from 2010 to the present
28. The names and telephone numbers of all
 1. OPC
 2. DMA employees former and present who have or have had access to plaintiff, Stephan Ricks, records from 2013 to 2023
29. All information stored on current or former employees smart phones as well as home personal computers

Plaintiff, Stephan Ricks, requests the following defendants

1. Diane McIver

2. Roxanne Meriquil
3. Nicole Guptil
4. Emily Habermehl
5. Agui Rivera
6. Mondo Reyes
7. Travis county social workers and health and human services supervisors

to appear for pending depositions by plaintiff, Stephan Ricks, and to provide and bring along to the deposition their personal federal or state picture IDs, their personal employment/trade licenses, all documents and data requested by the plaintiff, Stephan Ricks

Which include copies of plaintiff's lease, text messages, emails, past and present lawsuits, photographs, and social media postings, from 2010 to the present, to the location and date to be provided later

To include the following documents and things:

1. electronic documents
2. emails
3. Voicemails
4. text messages
5. Photographs
6. all work orders
7. all fire marshal inspections
8. HUD property inspections including the names of all the HUD inspectors
9. Leases
10. electronic recordings
11. appointment schedules
12. written communications documents
13. Facebook

14. Twitter
15. Tic Tok
16. WhatsApp
17. Signal
18. Instagram
19. Duo, and any other social media platforms
20. any and all past and pending lawsuits from 2011 to 2023 against the defendants OPC and DMA Properties
21. The names and telephone numbers of all custodians of all records
22. The location of where all records are stored
23. lawsuits, specifically against DMA Properties and employees working for DMA Properties
24. The policies and procedures for the retention of all records
25. The names of insurance companies and telephone numbers and contact persons
26. The monetary amount of their insurance policies
27. all other communications relevant to plaintiff, Stephan Ricks' case, from 2010 to the present
28. The names and telephone numbers of all

1.OPC

2.DMA employees former and present who have or have had access to plaintiff, Stephan Ricks, records from 2013 to 2023

29. All information stored on current or former employees smart phones as well as home personal computers

by the plaintiff, Stephan Ricks.

2. Plaintiff, Stephan Ricks, moves the court to enter an order to subpoena the following

defendants along with the aforementioned documents and records relevant to plaintiff, Stephan

Ricks' case, from 2010 to the present: M. Reyes, A. Rivera, Sheryl Low, Jamey Bellise, Emily

Habermehl, Roxanne Meriquil, Diane McIver, and the CEO of the company OPC.

3. Plaintiff, Stephan Ricks, moves the court to enter an order compelling defendant Diane McIver

to provide plaintiff, Stephan Ricks, with the name, phone number, email and mailing address of

the custodian of records for DMA Properties.

4. Plaintiff, Stephan Ricks, moves the court to enter an order giving an exemption for fees for

accessing all information and records relevant to plaintiff, Stephan Ricks' case through PACER:

see 28-CFR section 35.160, effective communications under the Americans With Disabilities

Amendment.

October 11, 2022

Plaintiff: Stephan Ricks

Case Number: 22-CV-00773-LY

Subject: Plaintiff, Stephan Ricks' request for appointment of a special master

Plaintiff, Stephan Ricks, moves the court to enter an order for appointment of a special master to objectively and independently investigate plaintiff Stephan Ricks' discrimination complaint, under Title 3, the Americans with Disabilities Act of 1990; title 8, the Fair housing Act of 1968; and retaliation against plaintiff, Stephan Ricks, under Title 5; also the Rehabilitation Act of 1973, which requires reasonable accommodations and modifications for persons with disabilities.